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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL DECLARATION OF
LAMBERTUS HESSELINK IN SUPPORT
OF WAYMO'S STATEMENT IN
RESPONSE TO COURT'S QUESTIONS
REGARDING TRADE SECRET NUMBER
96**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
7 Seal Declaration of Lambertus Hesselink in Support of Waymo’s Statement in Response to Court’s
8 Questions Regarding Trade Secret Number 96 (“Hesselink Declaration”), filed concurrently herewith
9 (the “Administrative Motion”). The Administrative Motion seeks an order sealing the following
10 materials filed concurrently herewith:

| Document | Portions to Be Filed Under Seal | Designating Party |
|-----------------------|---------------------------------|----------------------|
| Hesselink Declaration | Entire document | Waymo and Defendants |

14 3. Specifically, the entirety of the Hesselink Declaration contains or refers to trade secret
15 information, which Waymo seeks to seal.

16 4. The entirety of the Hesselink Declaration contains, references, and/or describes
17 Waymo’s trade secrets, including as misappropriated by Defendants. The information Waymo seeks
18 to seal includes the confidential design and functionality of Waymo’s proprietary autonomous vehicle
19 system, including its LiDAR designs, which Waymo maintains as secret. I understand that these trade
20 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to
21 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s
22 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle
23 system. If such information were made public, I understand that Waymo’s competitive standing
24 would be significantly harmed.

25 5. Waymo’s request to seal is narrowly tailored to those portions of the Hesselink
26 Declaration that merit sealing.

